Main Office:

September 24, 2024

1 Wall Street

VIA ECF

ph 518.869.9094

Albany, NY 12205-3827 VIA EC

fx 518.869.5142

www.LWFLegal.com

Hon. Miroslav Lovric

Magistrate Judge

Northern District of New York District Court Federal Buildings and U.S. District Court

15 Henry Street

Binghamton, NY 13901

RE: Kearns v. Wallin and Syracuse University NDNY Civil No.: 5:23-cv-01500 (DNH-ML

Dear Judge Lovric,

We represent the Plaintiff in this matter.

A prior Liquidation and Injunction Order of the Delaware Court of Chancery stayed this proceeding as against Syracuse University for a period of 180 days. Said stay expired on May 6th, 2024.

While plaintiff acknowledges that there is a pending Order to Show Cause that seeks the commencement of a New York ancillary receivership proceeding for Arrowood and appointment of Superintendent Harris as ancillary receiver, and a further 180 stay of all actions as against Arrowood's insured, plaintiff notes that there is no present Order further staying these proceedings as against Arrowood's insured. The former Order as noted above expired on May 6th, 2024.

As such, Plaintiff seeks that this matter move forward in this Court as there is no current Order staying these proceedings.

Respectfully,

LaFave, Wein & Frament, PLLC

By:

Amina Karic, Esq. akaric@lwflegal.com